

EXHIBIT 6

**UNREDACTED VERSION
OF DOCUMENT
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9 Attorneys for Plaintiff WAYMO LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF’S FOURTH
SUPPLEMENTAL OBJECTIONS AND
RESPONSES TO UBER’S FIRST SET OF
INTERROGATORIES (NOS. 1-11)**

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1	94	Pierre-Yves Droz, Sam Lenius, Sean Noyce
2	95	Pierre-Yves Droz, Sam Lenius, Sean Noyce
3	96	Pierre-Yves Droz, Sam Lenius, Sean Noyce
4	97	Pierre-Yves Droz, Sam Lenius, Sean Noyce
5	98	Pierre-Yves Droz, Sam Lenius, Sean Noyce
6	99	Pierre-Yves Droz, Sam Lenius, Sean Noyce
7	100	Pierre-Yves Droz, Sam Lenius, Sean Noyce
8	101	Pierre-Yves Droz, Sam Lenius, Sean Noyce
9	102	Pierre-Yves Droz, Sam Lenius, Sean Noyce
10	103	Pierre-Yves Droz, Sam Lenius, Sean Noyce
11	104	Pierre-Yves Droz, Sam Lenius, Sean Noyce
12	105	Pierre-Yves Droz, Rahim Pardhan, Sean Noyce
13	106	Pierre-Yves Droz
14	107	Pierre-Yves Droz
15	108	Dan McCloskey, Sasha Zbrozek
16	109	Pierre-Yves Droz, Sam Lenius, Sean Noyce, Dan McCloskey, Sasha Zbrozek, and individuals identified in SVN server’s revision history
17	110	Pierre-Yves Droz, Gaetan Pennecot, Anthony Levandowski, Dmitri Dolgov, Bryan Salesky
18	111	Pierre-Yves Droz, Daniel Gruver, Luke Wachter, Drew Ulrich, Gaetan Pennecot, Dorel Ionut Iordache, Anthony Levandowski, Will McCann
19	112	Pierre-Yves Droz
20	113	Pierre-Yves Droz, Sam Lenius
21	114	Pierre-Yves Droz, Blaise Gassend
22	115	Pierre-Yves Droz, Daniel Gruver
23	116	Pierre-Yves Droz, Mark Shand, Sam Lenius, Sean Noyce
24	117	Pierre-Yves Droz, Gaetan Pennecot
25	118	Pierre-Yves Droz, Blaise Gassend
26	119	Pierre-Yves Droz, Gaetan Pennecot
27	120	Pierre-Yves Droz, Gaetan Pennecot, Drew Ulrich, Dorel Ionut Iordache
28	121	Pierre-Yves Droz, Jonathan Dowdall, Christian Lauterbach

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5:

Waymo incorporates by reference its General Objections. Waymo further objects to this interrogatory on the grounds that it is vague and ambiguous, including with respect to the term “development.” Waymo further objects to this request to the extent it is compound, complex, and contains multiple subparts.

Subject to and without waiving the foregoing General and Specific Objections, Waymo responds as follows:

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Waymo identifies each individual named or otherwise identified on the documents (*e.g.*, via custodial information) identified in response to Uber’s Interrogatory No. 4, on a trade secret by trade secret basis, as well as contributors to the misappropriated SVN files identified in response to Uber’s Interrogatory No. 10, as reflected by the names of commits maintained in the SVN server’s revision history.

Waymo further identifies the following individuals involved in the development of the trade secrets identified in response to Interrogatory No. 1:

Trade Secret No.	Individuals Involved in Development
1	Pierre-Yves Droz, Ben Ingram, Luke Wachter, Scott McCloskey, Anthony Levandowski, Gaetan Pennecot, Christian Lauterbach
2	Pierre-Yves Droz, Gaetan Pennecot
3	Pierre-Yves Droz, Gaetan Pennecot
4	Pierre-Yves Droz, Ben Ingram, Luke Wachter, Scott McCloskey, Anthony Levandowski, Gaetan Pennecot, Christian Lauterbach, Sean Noyce
5	Pierre-Yves Droz, Gaetan Pennecot
6	Pierre-Yves Droz, Ben Ingram, Luke Wachter, Scott McCloskey, Anthony Levandowski, Gaetan Pennecot, Christian Lauterbach
7	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver
8	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver, Sean Noyce
9	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver
10	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver, Sam Lenius, Radu Raduta, Dorel Ionut Iordache
13	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver
14	Pierre-Yves Droz, Gaetan Pennecot, Daniel Gruver
15	Pierre-Yves Droz, Gaetan Pennecot, Sean Noyce
16	Pierre-Yves Droz, Sam Lenius, Sean Noyce
17	Gaetan Pennecot, Sean Noyce
19	Pierre-Yves Droz, Sam Lenius, Will McCann, Bernard Fidric
20	Sam Lenius, Paul Karplus
25	Ben Ingram, Chris Leger, Scott McCloskey, Chris Ludwick, Michael Epstein, Dmitri Dolgov, Christian Lauterbach, Jonathan Dowdall, Dave Silver, JiuJun Zhu, Dave Fergeson, Brandon Luders, Pierre-Yves Droz, Luke Wachter, Blaise Gassend
38	Pierre-Yves Droz, Ben Ingram
39	Pierre-Yves Droz, Ben Ingram, Luke Wachter, Scott McCloskey, Anthony Levandowski, Gaetan Pennecot, Christian Lauterbach
42	Pierre-Yves Droz, Gaetan Pennecot
43	Pierre-Yves Droz, Gaetan Pennecot
46	Pierre-Yves Droz, Blaise Gassend
48	Pierre-Yves Droz, Bernard Fidric, Zachary Morriss, Rahim Pardhan

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1	49	Pierre-Yves Droz, Will McCann, Drew Ulrich, Arda Akman
2	62	Pierre-Yves Droz, Daniel Rosenband, Vadim Gutnik, Andy Abo
3	63	Pierre-Yves Droz, Will McCann, Rahim Pardhan, Soheil Farshchian
4	72	Pierre-Yves Droz, Bernard Fidric, Anthony Levandowski, Daniel Rosenband, Gaetan Pennecot
5	75	Sameer Kshirsagar, Jon Switkes, Madeline Lie
6	76	Sameer Kshirsagar, Jon Switkes, Madeline Lie
7	77	Sameer Kshirsagar, Jon Switkes, Madeline Lie
8	78	Sameer Kshirsagar, Jon Switkes, Madeline Lie
9	79	Sameer Kshirsagar, Jon Switkes, Madeline Lie
10	80	Sameer Kshirsagar, Jon Switkes, Madeline Lie
11	81	Pierre-Yves Droz, Blaise Gassend, Luke Wachter, Sam Lenius
12	82	Pierre-Yves Droz, Blaise Gassend, Luke Wachter, Sam Lenius
13	83	Pierre-Yves Droz, Blaise Gassend, Luke Wachter, Sam Lenius
14	84	Pierre-Yves Droz, Blaise Gassend, Luke Wachter, Sam Lenius
15	85	Individuals identified in the document cited in this Trade Secret
16	86	Pierre-Yves Droz, Bernard Fidric
17	87	Pierre-Yves Droz, Dorel Ionut Iordache
18	88	Pierre-Yves Droz, Dorel Ionut Iordache
19	89	Pierre-Yves Droz, Will McCann, Rahim Pardhan, Soheil Farshchian
20	90	Bernard Fidric
21	91	Pierre-Yves Droz, Anthony Levandowski
22	92	Tim Willis
23	93	Tim Willis
24	94	Pierre-Yves Droz, Sam Lenius, Sean Noyce
25	95	Pierre-Yves Droz, Sam Lenius, Sean Noyce
26	96	Pierre-Yves Droz, Sam Lenius, Sean Noyce
27	97	Pierre-Yves Droz, Sam Lenius, Sean Noyce
28	98	Pierre-Yves Droz, Sam Lenius, Sean Noyce
	99	Pierre-Yves Droz, Sam Lenius, Sean Noyce
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	101	Pierre-Yves Droz, Sam Lenius, Sean Noyce
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	103	Pierre-Yves Droz, Sam Lenius, Sean Noyce
	104	Pierre-Yves Droz, Sam Lenius, Sean Noyce
	105	Pierre-Yves Droz, Rahim Pardhan, Sean Noyce
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	107	Pierre-Yves Droz
	108	Dan McCloskey, Sasha Zbrozek
	109	Pierre-Yves Droz, Sam Lenius, Sean Noyce, Dan McCloskey, Sasha Zbrozek, and individuals identified in SVN server’s revision history
	110	Pierre-Yves Droz, Gaetan Pennecot, Anthony Levandowski, Dmitri Dolgov, Bryan Salesky

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

111	Pierre-Yves Droz, Daniel Gruver, Luke Wachter, Drew Ulrich, Gaetan Pennecot, Dorel Ionut Iordache, Anthony Levandowski, Will McCann
112	Pierre-Yves Droz
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116	Pierre-Yves Droz, Mark Shand, Sam Lenius, Sean Noyce
117	Pierre-Yves Droz, Gaetan Pennecot
118	Pierre-Yves Droz, Blaise Gassend
119	Pierre-Yves Droz, Gaetan Pennecot
120	Pierre-Yves Droz, Gaetan Pennecot, Drew Ulrich, Dorel Ionut Iordache
121	Pierre-Yves Droz, Jonathan Dowdall, Christian Lauterbach

INTERROGATORY NO. 6:

Separately for each alleged Waymo trade secret identified in response to Interrogatory No. 1, describe how long it took and how much it cost to develop.

RESPONSE TO INTERROGATORY NO. 6:

Waymo incorporates by reference its General Objections. Waymo further objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, and oppressive, including to the extent that it asks Waymo to respond “[s]eparately for each alleged Waymo trade secret.” Waymo further objects to this request to the extent it is compound, complex, and contains multiple subparts.

Subject to and without waiving the foregoing General and Specific Objections, Waymo responds as follows:

Waymo began developing its in-house LiDAR systems in 2011. Waymo’s development of its in-house LiDAR systems drew from development efforts of 510 Systems, led by engineer Pierre-Yves Droz. 510 Systems began developing a mapping LiDAR in 2009; by December 2010, these efforts had led to a prototype code-named “Little Bear” (“LBr”). In early summer 2011, 510 Systems began developing LiDAR systems for self-driving applications, building on the success of LBr. However, because of [REDACTED] that 510 Systems learned from its experience with LBr, 510 Systems proceeded with development

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1 00026526, WAYMO-UBER-00026529, WAYMO-UBER-00026530, WAYMO-UBER-
 2 00026531, WAYMO-UBER-00026532, WAYMO-UBER-00026533, WAYMO-UBER-
 3 00026534, WAYMO-UBER-00026535, WAYMO-UBER-00026536, WAYMO-UBER-
 4 00026539, WAYMO-UBER-00026540, WAYMO-UBER-00026543, WAYMO-UBER-
 5 00026544, WAYMO-UBER-00026603, WAYMO-UBER-00026604, WAYMO-UBER-
 6 00026725, WAYMO-UBER-00026727, WAYMO-UBER-00026888, WAYMO-UBER-
 7 00027015, WAYMO-UBER-00027016, WAYMO-UBER-00027017, WAYMO-UBER-
 8 00027018, WAYMO-UBER-00027019, WAYMO-UBER-00027020, WAYMO-UBER-
 9 00027034, WAYMO-UBER-00027035, WAYMO-UBER-00027037, WAYMO-UBER-
 10 00027038, WAYMO-UBER-00027039, WAYMO-UBER-00027040, WAYMO-UBER-
 11 00027041.

12 Waymo will further investigate this interrogatory and will supplement its response if
 13 necessary.

14 DATED: August 1, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
 LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven

Attorneys for WAYMO LLC

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